

W.K., et al v. Red Roof Inns, Inc., et al

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,
D.P., A.F., C.A., R.K. and K.P.,

Plaintiffs,

vs.

CIVIL ACTION NO.:

1:20-CV-05263-MHC

RED ROOF INNS, INC.; FMW RRI
NC, LLC; RED ROOF FRANCHISING,
LLC; RRI WEST MANAGEMENT, LLC;
VAHARI HOTEL, LLC; WESTMONT
HOSPITALITY GROUP, INC.;
and RRI III, LLC,

Defendants.

VIDEOTAPED DEPOSITION OF D.P

June 30, 2022

9:12 a.m.

1201 West Peachtree Street, Suite 3200

Atlanta, Georgia

Carolyn M. Carboni, RPR, RMR, CCR-B-878

Leo Mileman, Videographer

PL Sum. J.**Ex. 007**

W.K., et al v. Red Roof Inns, Inc., et al

Page 2

1 APPEARANCES OF COUNSEL:

2 On behalf of the Plaintiffs in W.K., et al. v. Red
3 Roof Inns, et al. case:

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10 On behalf of the Plaintiffs in Jane Doe, et al. v.
11 Westmont Hospitality Group, et al. case:

12 MICHAEL R. BAUMRIND, ESQUIRE (where noted)
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1 APPEARANCES (Continued):

2 On behalf of the Defendants Red Roof Inns, Inc.;
3 FMW RRI NC, LLC; Red Roof Franchising, LLC; RRI
4 West Management, LLC; Westmont Hospitality Group,
5 Inc.; and RRI III, LLC:

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12 On behalf of the Defendant Varahi Hotel, LLC:

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19 Also Present:

20 Cameron Ward (where noted)

21 Samantha Girschick (via Zoom)

22 Beth Richardson (via Zoom)

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24

25

1 claim that you were subjected to sex trafficking in
2 January of 2017?

3 A I believe it's through the whole year of
4 2017.

5 Q January to December 2017, the whole year?

6 A So I would have been out from January to
7 November or October.

8 Q When you say "out," what do you mean?

9 A I got locked up in October.

10 Q All right. So once you were arrested and
11 in jail of October of 2017, that's when the period
12 of alleged sex trafficking ended; is that correct?

13 A No.

14 Q Okay. Where am I wrong in there?

15 A After I got out of jail, I was back with
16 my trafficker.

17 Q Okay. Let me back up one second.

18 In 2017, when were you in jail in 2017?

19 A There was multiple times that I was in
20 jail.

21 Q Okay. All right. And so --

22 MR. BAUMRIND: Maybe let's go off the
23 record real quick.

24 THE VIDEOGRAPHER: Off the video record at
25 9:19 a.m.

1 A Several times within 2014. And then they
2 finally repoed it in, I think, April of 2015. I
3 don't really recall the exact because it was a
4 dumped car, so...

5 Q It was a what?

6 A I dumped it.

7 Q You left it somewhere?

8 A Yes.

9 Q Okay. Between around April 2015 or
10 whenever you left the vehicle, this Hyundai Sonata,
11 and when you were arrested in fall 2017, how did
12 you get around?

13 A I was borrowing somebody -- well, Trap was
14 borrowing somebody else's car.

15 Q When did you first meet Trap?

16 A I met him in -- towards the end of 2016,
17 beginning of 2017.

18 Q And Trap, what's his real name?

19 A [REDACTED].

20 Q [REDACTED]?

21 A Yes.

22 Q Same gentleman you told us about earlier?

23 A Yes.

24 Q Okay. All right. So you met Trap towards
25 the end of 2016, beginning of 2017. Let me put it

1 Q All right. And actually, on page 4, the
2 question that's asked asks you to identify persons
3 involved in trafficking you in any form. And on --
4 beginning on page 5 and continuing to page 8, you
5 see there's a bunch of names given, correct?

6 A Yes.

7 Q All right. Let me just run through a
8 couple of these with you briefly for a moment,
9 okay?

10 A Okay.

11 Q The first person listed says, "Ms. Dee,"
12 correct?

13 A Yes.

14 Q Okay. And the general description says,
15 "Ms. Dee is an African American woman who may have
16 worked as a housekeeper at the Smyrna Red Roof Inn.
17 D.P. is not certain of her full and/or legal name,
18 but recalls Mr. [REDACTED] talking to Ms. Dee while
19 D.P and Mr. [REDACTED] waited for rooms at the Smyrna
20 Red Roof Inn."

21 Did I read that correctly?

22 A Yes.

23 Q Okay. Beyond that, what else can you tell
24 us about who Ms. Dee is?

25 A I do not remember too much about her.

1 Q What do you remember about her?

2 A The only thing I do remember about her is
3 that she would always be in the laundry room.

4 Q You would see her in the laundry room?

5 A We would stand in the breezeway by the
6 laundry room.

7 Q Can you describe her at all, her
8 appearance?

9 A She was just an African American woman. I
10 don't really know details, like hair, height, I
11 don't know any of that.

12 Q Do you know how old she is?

13 A No, I do not.

14 Q How old did she appear?

15 A I do not know.

16 Q Did she appear older than you, younger?

17 A Yes, older.

18 Q Did she have any tattoos, marks or scars
19 that you remember?

20 A I do not remember.

21 Q Do you remember how tall she was?

22 A No.

23 Q Taller than you or shorter than you?

24 A I don't remember that.

25 Q Do you have any --

1 A It was brief.

2 Q I'm sorry.

3 A It was brief with me and her.

4 Q How many times did you speak with Ms. Dee?

5 A I never really spoke to her besides saying
6 hi.

7 Q All right. Second person [REDACTED] quotes,
8 Trap, quotes, [REDACTED] That's Mr. [REDACTED]
9 [REDACTED] correct?

10 A Yes.

11 Q You've identified him as one of your
12 traffickers, correct?

13 A Yes.

14 Q All right. And as far as his current
15 contact information, it says, "Unknown but may be
16 incarcerated in Cobb County."

17 Today, do you know where Mr. [REDACTED]
18 [REDACTED] is?

19 A I do not know where he is, but I do know
20 he's not in Cobb County anymore.

21 Q You believe he's currently incarcerated?

22 A He's not.

23 Q Do you believe he's in Georgia?

24 A I do not know.

25 Q When is the last time you spoke to Mr. [REDACTED]

1 [REDACTED] ?

2 A I visited him in jail in 2019.

3 Q And in 2019, was that the last time that
4 you spoke to him?

5 A It's the last conversation I can remember
6 physically having with him.

7 Q Have you talked to him on the phone since
8 2019?

9 A Somebody called my phone and said it was
10 him trying to get ahold of me, but that's about it.
11 That was, like, early 2020.

12 Q All right. So the last time you saw and
13 spoke to Mr. [REDACTED] was in 2019?

14 A Yes.

15 Q All right. Third line or third row says,
16 "Security guard." Who was this security guard?

17 A I do not know his name, but he was the
18 security guard working at the Red Roof at the
19 current time that I was there. He got basically in
20 my face after me and [REDACTED] got into a fight. I went
21 to the vending machine, and he blocked me in and
22 basically told me that if we weren't quiet, he was
23 going to call the police because he knew what we
24 were doing.

25 Q He knew y'all had been fighting?

1 A Yes.

2 Q Can you describe any physical
3 characteristics of this security guard to us?

4 A He was really tall, African American. He
5 had an African accent. That's all I really know.

6 Q Was he a slim, heavyset, average kind of
7 build?

8 A I would say he's average.

9 Q Do you remember anything about his hair?

10 A No.

11 Q How about his age?

12 A No.

13 Q When -- you said that you interacted with
14 this security guard near the vending machine at the
15 current time that you were at the Smyrna Red Roof
16 Inn, do you remember now when in 2017 that was?

17 A I do not remember exactly when it was.

18 Q How many times were you at the Smyrna Red
19 Roof Inn?

20 A It was --

21 MR. BAUMRIND: Objection. Sorry.

22 Objection.

23 THE WITNESS: You're fine.

24 A It was just several times over the course
25 of me being with Trap.

1 BY MR. REAM:

2 Q How many is several?

3 A It was probably more than five or six
4 individual days, sometimes weeks. I do have a lot
5 of different times that I stayed there a long
6 period of time under other people's names.

7 Q You told us earlier that this security
8 guard sort of got in your face and told you to be
9 quiet because he knew what you and Trap were doing,
10 right?

11 A Yes.

12 Q All right. And you told me already you
13 said that he knew y'all were fighting, correct?

14 A That night, yes.

15 Q Okay. Is it your belief that this
16 security guard knew that you were engaged in sex in
17 exchange for money at that time?

18 A I believe he knew that because he also
19 knew Trap as well.

20 Q How did he know Trap?

21 A I don't know if they actually knew each
22 other, like, on the streets as friends, but he
23 would talk to the security guard a lot about
24 watching, where he could go, what rooms are good.
25 But that's -- that's really it. I only had that

1 one interaction with the security guard myself.

2 Q All right. So you had one interaction
3 with this really tall security guard, correct?

4 A Yes.

5 Q All right. And you're saying that Trap
6 would often talk to this security guard?

7 A Yes.

8 Q Okay. Were you standing with Trap when he
9 would talk to this security guard?

10 A Sometimes I was in the vicinity.
11 Sometimes I was in the room.

12 Q Is there anything else you remember Trap
13 saying to this security guard or the security guard
14 saying to Trap?

15 A No.

16 Q All right. The next several people on
17 this list are some plaintiffs who are also in the
18 W.K. lawsuit and the Jane Doe 1 to 4 lawsuits.

19 Let me ask you first: Do you know any of
20 the plaintiffs in the -- let's just say the
21 lawsuits filed against Red Roof Inn and Varahi
22 Hotel?

23 MR. BAUMRIND: Objection.

24 A Can you rephrase that?

25 BY MR. REAM:

1 Q Yeah. Let me ask you this first: Are you
2 aware there are other plaintiffs like yourself in
3 the lawsuit, case number ending 5263, who have also
4 sued Red Roof Inns, Inc., and others and Varahi
5 Hotel?

6 A I do not know anybody in this case.

7 Q Okay. Let's just run through some of
8 these names then. [REDACTED], do you know who
9 that is?

10 A No.

11 Q [REDACTED], do you know who that is?

12 A No.

13 Q [REDACTED], do you know who she is?

14 A No.

15 Q [REDACTED], do you know who she is?

16 A No.

17 Q [REDACTED], do you know who she is?

18 A No.

19 Q [REDACTED], do you know who she is?

20 A No.

21 Q [REDACTED], do you know who she is?

22 A No.

23 Q [REDACTED], do you know who she
24 is?

25 A No.

1 A And it was just known --

2 Q I'm sorry.

3 A It's just a known thing that if you see
4 somebody in the same predicament, you kind of know.

5 Q What predicament?

6 A We couldn't leave. We had dudes following
7 us around all the time. We'd have multiple people
8 coming in and out of rooms.

9 Q Did you ever see [REDACTED] engage in
10 any sexual act?

11 A No.

12 Q All right. Let's go back to a second.
13 Tell me the hotels that you were at where you also
14 saw [REDACTED].

15 A So there's the Motel 6 on Windy Hill and
16 Delk Road.

17 Q Right.

18 A The Hospitality. There's the Country
19 Hearth.

20 Q Is that one -- that's off 75 as well?

21 A And Windy Hill.

22 Q Right.

23 A The Masters Inn off Windy Hill. The Red
24 Roof on Windy Hill.

25 Q Any others?

1 of [REDACTED], are there other people in
2 your life you believe subjected you to sex
3 trafficking?

4 A Yes.

5 Q How many other people?

6 A Just one other.

7 Q Who was that one other?

8 A [REDACTED].

9 Q Before he was your trafficker, was he your
10 boyfriend?

11 A I believed he was.

12 Q During what period of time -- when did
13 you -- let me strike that and start over.

14 When did you first engage in a sexual act
15 with someone where drugs, money or something of
16 value was exchanged for performing that sex act?

17 A The earliest was when I was 17.

18 Q Where did that happen?

19 A Omaha, Nebraska.

20 Q How did that come about that you engaged
21 in a sex act where something of value was exchanged
22 in Omaha, Nebraska?

23 A I had ran away from my placement when I
24 was a teenager. And I ran into some people who
25 took advantage of us. And they basically said that

1 if we did anything that they told us to do, like
2 clean, see the guys, we would have a roof over our
3 head and they wouldn't call the police.

4 Q You said you were 17 at the time?

5 A Yes.

6 Q So this would have been around 2004; is
7 that right?

8 A Yes.

9 Q You said you ran away from a placement.
10 What kind of placement?

11 A I was in Boys Town.

12 Q Tell us what Boys Town is, please.

13 A Boys Town is a home for troubled children.
14 They help with, like, psychiatry and criminal
15 records. So it's just a place for troubled kids to
16 go so they can be, I guess -- they call it
17 recorrected.

18 Q Is it a group home?

19 A Yes.

20 Q When did you first go to Boys Town?

21 A 2003.

22 Q And that was in Omaha?

23 A Yes.

24 Q And you ran away from the Boys Town group
25 home sometime in 2004?

1 A Yes.

2 Q And then you met, as you said, a group of
3 people who took advantage of you?

4 A Yes.

5 Q Do you know any of their names?

6 A No.

7 Q How many were there?

8 A 12.

9 Q Were they adults?

10 A Yes.

11 Q Men, women, both?

12 A Just men that I can recall.

13 Q Let me be clear: When you say 12 men,
14 were there 12 men who subjected you to performing
15 sex acts in exchange for something of value at 17?

16 A Yes. But that was also a course of a
17 week's period of time that it was 12 different
18 people.

19 Q Were you forced to have sex with anyone
20 beyond that one-week period of time when you were
21 17?

22 A No.

23 Q How many different people were you forced
24 to have sex with when you were 17?

25 A It was 12.

1 Q Any others from 2017 that you were at only
2 one time?

3 A No.

4 Q Okay. In 2017, what's the longest period
5 of a single stay that you had at any of those
6 hotels?

7 A About a week.

8 Q And where in 2017 did you stay about a
9 week?

10 A The only time I stayed somewhere for a
11 long time was when I was at the Motel 6 on Delk
12 Road or the Red Roof. And the Red Roof I would
13 switch rooms frequently during my stay.

14 Q All right. So when you were at the Red
15 Roof Inn Smyrna in 2017, you would switch rooms
16 frequently, correct?

17 A Yes.

18 Q All right. And you believe that was one
19 of the two hotels in 2017 where you stayed about a
20 week?

21 A Yes.

22 Q As far as the longest period of time?

23 A At a time, yes.

24 Q How many different times or stays were you
25 at the Red Roof Inn Smyrna in 2017? Whatever is

1 the easiest way for you to think about it.

2 A So it's about five times, four or five
3 times.

4 Q All right. So about four or five separate
5 visits to and stays at the Red Roof Inn Smyrna?

6 A Yes. Without checking out, yes. Well, I
7 can't say that because we'd switch rooms. That's
8 technically checking out.

9 Q Well, let's -- let me ask it and put it --
10 let's think about it this way, okay? I want to
11 know the number of times that you went to the Red
12 Roof Inn, and then when you finally left the Red
13 Roof Inn, let's call that one stay, correct? Okay?

14 A Okay.

15 Q How many times did you come to the Red
16 Roof Inn, regardless of how long you were there and
17 then left, went somewhere else, and then eventually
18 came back to the Red Roof Inn, how many times did
19 that happen in 2017?

20 A I would say more than five, but I can't
21 really -- because some days we would just stay one
22 day and leave.

23 Q More than 10 separate times you think you
24 were at the Red Roof in Smyrna in 2017?

25 A I really can't recall. I just know it was

1 more than the four or five times that I stayed
2 there for a long period of time. We would go for,
3 like, one day and leave or we'd go get the room
4 for, like, a few hours and leave. Sometimes I
5 would just honestly have a room there and stay at
6 another hotel.

7 Q Sometimes you had a room at the Red Roof
8 Inn but you stayed at another hotel?

9 A Like next door hotel.

10 Q Like the Comfort or the Masters across the
11 street?

12 A The Masters Inn. But we would still have
13 a room at the Red Roof so that I wasn't seeing
14 people in the same bed that we were sleeping in.

15 Q All right. When you were seeing -- we've
16 heard -- let me just say this: We've heard a lot
17 of different terms for the purchasers of commercial
18 sex; johns, tricks, dates, buyers, plays, things
19 like that. What did you call those individuals?

20 A Johns.

21 Q Okay. All right. During the times that
22 you saw johns at the Red Roof Inn Smyrna in 2017,
23 were you staying and sleeping, and I mean literally
24 going to sleep, at other hotels?

25 A Sometimes I would.

1 Q Sometimes, okay. How many times in 2017
2 do you believe you stayed at the Red Roof Inn
3 Smyrna for about a week?

4 A About four to five times.

5 Q All right. And so in total, you believe,
6 in terms of week-long stays at the Red Roof Inn
7 Smyrna in 2017, that you did that about four or
8 five times?

9 A Yes.

10 Q And I think you've told us there were
11 other times in 2017 you were at the Red Roof Inn
12 Smyrna for only a few hours, correct?

13 A Yes.

14 Q And there were times that you were at the
15 Red Roof Inn Smyrna for only a day; is that
16 correct?

17 A Yes.

18 Q All right. Do you remember the first time
19 in 2017 you were at the Red Roof Inn Smyrna?

20 A I don't recall the dates or times. I know
21 it was probably around March or April, but I,
22 again, didn't stay in my own name.

23 Q But you believe it was around March or
24 April of '17?

25 A Yeah.

1 Q What in general did she know?

2 A She knew that [REDACTED] was making me have sex
3 with people for money so that he could buy drugs.
4 And she also knew that he was feeding them to me.

5 Q Feeding drugs to you?

6 A Yes.

7 Q How does she know -- or how did she know
8 that [REDACTED] was making you have sex with people for
9 money so that he could buy drugs?

10 A I told her.

11 Q When did you tell her?

12 A I don't recall exactly when I told her.

13 Q In what year did you tell her?

14 A I can't recall that.

15 Q Was it sometime this year in 2022?

16 A She -- I told her before when I was with
17 [REDACTED] but I can't remember if it was 2017 or '18.

18 Q You told your mom that [REDACTED] was making you
19 have sex with people for money you believe sometime
20 in 2017 or '18?

21 A Yes.

22 Q And you said she cut you off?

23 A She had cut me off while I was with [REDACTED]

24 Q Before you told her that he was forcing
25 you to have sex with people for money?

1 A Yes.

2 Q When you say she cut you off before, what
3 did that mean or what did that look like?

4 A She stopped helping me. She stopped
5 giving me food. She stopped giving me money.
6 Couldn't call. See my son. Couldn't do anything.

7 Q And your mom took those actions before you
8 told her that you were being forced by [REDACTED] to have
9 sex with people for money?

10 A Yes.

11 Q Once you told your mom, whenever it was,
12 that [REDACTED] was forcing you to have sex for money,
13 what did your mother do?

14 A At the time, she didn't do anything that I
15 recall. Like, she didn't do anything.

16 Q What did you tell her?

17 A I didn't tell her exactly that he was
18 making me sell myself. I told her that I was
19 having sex for money for him to provide drugs to
20 the community.

21 Q That's what you told your mother, and you
22 said she didn't do anything or say anything?

23 A I believe at the time, she didn't think
24 that she could do anything. Because I was really
25 gone on drugs, and I was abused a lot by Trap as

1 would you tell her?

2 A I would just tell her about what was
3 happening in the rooms or at the house, that he was
4 beating on me. I would just tell her, like, what
5 he was doing, like, how I was getting the drugs,
6 all types of things.

7 Q Did you tell Ms. Musgrove, like you told
8 your mother, that [REDACTED] was forcing you to have sex
9 with people?

10 A I can't recall those exact comments coming
11 out to her.

12 Q You said you told Ms. Musgrove about what
13 was going on in the hotel rooms, right?

14 A Between me and [REDACTED] yes.

15 Q And what was going on between you and [REDACTED]
16 in the hotel rooms?

17 A [REDACTED] would beat me a lot. He would pistol
18 whip me. He would basically put me on the ground
19 with a gun to my head. So I would tell her about
20 those incidences. Many times I would have bruises
21 everywhere, and she just knew what happened.

22 Q Do you know why Ms. Musgrove similarly
23 wasn't listed in your original responses?

24 A I had further time to think about
25 different people who were aware of my past.

1 A Three.

2 Q Okay. What are those three?

3 A First one was Highland Rivers, and then
4 the two at Mothers Making a Change.

5 Q Where was the Highland Rivers facility
6 that you went to?

7 A What's that city called? Cedartown.

8 Q Okay. How long were you inpatient at
9 Highland Rivers?

10 A A week possibly. May have been a little
11 bit more than a week.

12 Q Now, you told me that you have a
13 certification in, what did you say, medical
14 administration?

15 A Yes.

16 Q Okay. Have you ever attended any kind of
17 nursing programs?

18 A No.

19 Q Any kind of med school physician training
20 programs?

21 A No.

22 Q Okay. What's your understanding,
23 Ms. [REDACTED] of what you were being treated for at
24 Highland Rivers?

25 A I was sent to Highland Rivers on a 1013,

1 which is suicide attempt. I know that I was being
2 treated for psychiatric evaluations. So at the
3 time they treated me for, I believe, PTSD and
4 bipolar disorder.

5 Q And Highland Rivers, were you there -- I
6 know you told me a week -- in the summer of 2014;
7 does that sound right?

8 A Yes.

9 Q Okay. And you said you were 1013'd there?

10 A Yes.

11 Q Do you remember if you were at a hospital
12 facility before being sent to Highland Rivers?

13 A I was at Kennestone.

14 Q All right. And at Mothers Making the
15 Change, what's your understanding of the first time
16 that you were treated there what you were being
17 treated for?

18 A I was being treated for drug abuse.

19 Q At that time, which drugs were you
20 abusing?

21 A Heroin, cocaine and marijuana.

22 Q The second time that you were at Mothers
23 Making the Change program, what's your
24 understanding of what you were being treated for
25 there?

1 A The second time I went to Mothers Making a
2 Change was a precaution, so I did not relapse after
3 I had my baby.

4 Q When you got together with Mr. [REDACTED] in
5 '19, did you use any drugs then?

6 A No.

7 Q All right. You mentioned just a little
8 bit earlier about treatments for PTSD and
9 treatments for bipolar. Have you been diagnosed by
10 anybody with PTSD -- with having PTSD?

11 A Highland Rivers was the first one to put
12 it on my record.

13 Q And that was in 2014?

14 A Yes.

15 Q Have you received a diagnosis of bipolar
16 from any physician?

17 A I have.

18 Q When did that occur first?

19 A In 2014.

20 Q Okay. Also from --

21 A Well, honestly, I can't say that for sure
22 because my mom used to have me evaluated when I was
23 at Boys Town, and that's when the bipolar, I think,
24 first started coming up.

25 Q When you were in the Boys Town program,

1 were you taking any medications that you understood
2 were designed to treat a bipolar condition?

3 A I honestly don't remember taking medicine.

4 Q All right. Other than PTSD and bipolar,
5 to the best of your knowledge, have you ever
6 received a diagnosis for any other mental health
7 condition?

8 A I was told that I had schizophrenia --

9 Q Who told you that?

10 A -- by another doctor.

11 Q I'm sorry.

12 A By another doctor.

13 Q When were you told by a doctor that you
14 had schizophrenia?

15 A When I was in jail.

16 Q What time?

17 A The August 2014.

18 Q Do you believe you had schizophrenia in
19 August of 2014?

20 A At the time, I had symptoms showing that I
21 had it.

22 Q How did your symptoms present -- your
23 schizophrenia-related symptoms present at that time
24 in 2014?

25 A I started hearing voices.

1 location of in the parking lot.

2 Q I gotcha. Okay. All right. That's fine.

3 Okay. When did it start in your mind that

4 Mr. [REDACTED] was your boyfriend?

5 A So right after that incident, I met [REDACTED]
6 again on the street.

7 Q Right after the broken TV incident?

8 A Yes.

9 Q Okay.

10 A So me and him went back to my room and,
11 like, we were chilling for, like, probably about
12 two or three weeks, and we decided to work
13 together, I guess, be together. At the time, I
14 thought he was trying to be my boyfriend.

15 Q At that time, shortly after the broken TV
16 incident and you left [REDACTED] and you saw [REDACTED] out on
17 the street, what hotel did you go back to and bring
18 him back to?

19 A The Rodeway.

20 Q And at that point in time, when you were
21 first with Mr. [REDACTED] in early 2017, did you
22 have a plan to do, as you've described it earlier,
23 independent work and share that with Mr. [REDACTED]

24 A I did share with him what I did for my
25 money at that time.

1 Q And just to be clear, when you say you
2 shared with him, did you tell him or did you then
3 engage with sex for people -- sex with people for
4 money and then share some of the money with [REDACTED]

5 A So I told him that I was sleeping with
6 people for money or having sex with people for
7 money. And that's when he came up with the idea to
8 just do it so we could keep the room and the drugs
9 coming in.

10 Q To keep doing that, to keep having sex
11 with people for money?

12 A Yeah, but give him the money so he could
13 take care of what we needed to take care of in his
14 eyes.

15 Q And you went along with that?

16 A I did.

17 Q Okay. How long did those activities go on
18 until in your mind you realized Mr. [REDACTED] was
19 not your boyfriend?

20 A Honestly, I was kind of really drugged out
21 at the time, so I really had this false image of
22 what love really was with him. So in my eyes, I
23 continued to be just his girlfriend.

24 But now that I'm liking back on it today,
25 like, that's really not what happened. But in my

1 eyes back then, I would say that I felt like he
2 was.

3 Q That first time in the beginning, early
4 2017, when you told Mr. [REDACTED] that you had been
5 having sex with people for money, and y'all decided
6 that you would keep doing that but you would give
7 the money to [REDACTED] so that he could buy drugs and
8 things, did he threaten you at that time to keep
9 having sex with people and give him the money?

10 A I can't recall how the whole thing went
11 down.

12 Q Did he force you or beat you at that time?

13 MR. TONGE: Objection.

14 A I honestly do not remember how it started
15 with the whole -- I agreed to do it with him to get
16 money in, but then it came to the point where he
17 was taking everything. And I don't remember if
18 that's when he started beating on me or not.

19 BY MR. REAM:

20 Q Do you remember when it was, what time
21 period, that it changed to, as you've described, he
22 was taking everything?

23 A So it was probably a few months after I
24 met him for the second time.

25 Q And that second time occurred shortly

1 after the broken TV incident?

2 A Yes. So it would probably be around
3 April-ish or May of 2017.

4 Q And I think that's what you told us
5 earlier today was that the period of sex
6 trafficking, as you've alleged, under Mr. [REDACTED]
7 occurred from around April, May of 2017, until
8 October, November of 2017; is that correct?

9 A October, yes.

10 Q All right. I asked you earlier about the
11 Americas Best Value Inn. Have you ever engaged in
12 sex in exchange for money or things of value there?

13 A I don't remember.

14 Q Do you know where the Americas Best Value
15 Inn is located?

16 A Yes.

17 Q Okay. It's kind of near the Windy Hill
18 area?

19 A Yes.

20 Q At that point in time, in 2017, you had a
21 Facebook account, right?

22 A Yes.

23 Q Okay. And you had a Facebook app or
24 access on your cellphone?

25 A Yes.

1 (Recess from 4:40 to 5:03 p.m.)

2 THE VIDEOGRAPHER: Back on the video
3 record at 5:03 p.m.

4 BY MR. REAM:

5 Q All right. Ms. [REDACTED] we were talking
6 just before we left or broke, took a break, about
7 the last time that you were at the Smyrna Red Roof
8 Inn and having sex with anybody in exchange for
9 money or something. And to the best of your
10 knowledge, when did that last time occur?

11 A It was in September.

12 Q Of?

13 A Of 2017.

14 Q Okay. We talked briefly at the very
15 beginning about sort of the length of stays that
16 you had at the Smyrna Red Roof Inn. And correct me
17 if I'm wrong, but I believe you told us there were
18 some times that were only a few hours, there were
19 some times that were only a couple of days, and
20 there were some times that was about a week; is
21 that right?

22 A Yes.

23 Q Am I missing or did I leave out any
24 category of the length of stays that you had at the
25 Smyrna Red Roof Inn in 2017?

1 Q Okay. You said some people had you dress
2 up in -- dress up in what way?

3 A Like, they would ask me to wear, like,
4 skimpy shorts or a skirt with just my bra on, act
5 like I'm their maid.

6 Q Did you ever wear any maid outfits?

7 A I never owned one, so I just tried to
8 improvise.

9 Q Just acted it out?

10 A Yeah.

11 Q Minus the maid costume?

12 A Yes.

13 Q All right. And the outfits and things in
14 terms of skimpy outfits or skirts and stuff, is
15 that what you would wear in the rooms when the
16 johns arrive?

17 A Yes.

18 Q Okay. What about when you're outside the
19 hotel room, what would you wear then?

20 A I would still be wearing the same clothes
21 most of the time.

22 Q Did you walk around parking lots in skirt
23 and bra?

24 A No.

25 Q Did you ever -- excuse me. Anybody ever

1 have you wear lingerie?

2 A Yes.

3 Q Did you wear that inside the room for when
4 the johns got there?

5 A Yes.

6 Q Did you ever wear lingerie outside the
7 hotel room in the breezeways or in the parking lot?

8 A No.

9 Q Did you stay at any other hotels like the
10 ones -- we've gone through the lists earlier. Did
11 you stay at any of those other hotels for about a
12 week at a time?

13 A Yes, I did.

14 Q Which ones did you have about a --

15 A Mostly Masters Inn.

16 Q Masters Inn Windy Hill?

17 A Yes.

18 Q Any others you remember staying for about
19 a week at a time?

20 A The Motel 6.

21 Q Which one?

22 A Delk Road.

23 Q Okay.

24 A Oh, and Windy Hill.

25 Q Any others?

1 for the hotel or the Red Roof Inn brand and tell
2 them that you were forced to have sex for money at
3 that hotel?

4 A No.

5 Q Other than Ms. Dee, the
6 laundry/housekeeper person you told us about
7 earlier, was there anybody else, and the security
8 guard, the tall security guard, who you remember
9 interacting with at the Smyrna Red Roof Inn as far
10 as employees?

11 A I would just interact with whoever came to
12 my door. I don't recall names. I didn't know the
13 staff too well.

14 Q Did you ever ask any employee of the
15 Smyrna Red Roof Inn for any help --

16 A No.

17 Q -- from your trafficker?

18 A No.

19 Q Did you ever ask any employee to call the
20 police or a doctor or an ambulance or a family
21 member?

22 A No.

23 Q Did you see other people at the Smyrna Red
24 Roof Inn that you believed to be just regular hotel
25 customers in 2017?

1 you?

2 A No.

3 Q At the time in 2017, did you believe that
4 you were being subjected to sex trafficking by [REDACTED]

5 [REDACTED]

6 A At the time, no.

7 Q At the time in 2017, did you believe then
8 that you were being raped by these johns?

9 A I did not.

10 Q When did you come to have that belief that
11 these johns raped you in 2017?

12 A When I realized that it was not a wanted
13 situation --

14 Q And when did that --

15 A -- at that point.

16 Q I'm sorry.

17 A Sorry.

18 Q When did that occur?

19 A When I was locked up after my overdose. I
20 had a lot of time to sit and think.

21 Q That was in the later half of 2018?

22 A Yes.

23 Q And at that point in time, did you tell
24 anybody that you were raped by these people?

25 A No.

1 Q Did you see any doctors while you were
2 incarcerated that time?

3 A Are you talking about after my overdose?

4 Q Yes, ma'am. Sorry. After June 2018?

5 A Yes.

6 Q Did you tell any of them that men had
7 raped you or that you were subjected to sex
8 trafficking?

9 A No.

10 Q At the time in 2017, when you were at the
11 Red Roof Inn in Smyrna, you did not self-identify
12 as a victim of sex trafficking, true?

13 A At the time.

14 Q That's true?

15 A Yes.

16 Q And the realization that you were just
17 telling us about, that didn't happen for you until
18 after June of 2018 when you were in jail, as you
19 said, and had a lot of time to think; is that true?

20 A That's true.

21 Q Yeah, I think I asked you this. I'm
22 sorry.

23 Have you filed any other lawsuit other
24 than this W.K. versus Red Roof Inns, Inc., ever?

25 A No.

1 clear whether you were there voluntarily or not?

2 You thought you were there voluntarily?

3 A I thought I was there voluntarily. The
4 whole turning him thing in was, like, anything. It
5 could have been anything. Like even the arguments,
6 the beatings, the being held in my room, the not
7 eating, all of it, like, I could not turn him in.

8 Q In other words, even if you called
9 somebody, like the Red Roof corporate number, at
10 that time, you wouldn't have been able to say, "I'm
11 being forced into commercial sex," right, because
12 you didn't think at the time that that's what was
13 happening, right?

14 A Right.

15 Q Okay. But you want the Red Roof --
16 because, you know you've sued Red Roof here, the
17 franchisor as well, right? But you want Red Roof
18 to have known that you were being held against your
19 will and forced into sex when you didn't know about
20 it, correct?

21 A Yes.

22 Q Okay. And why is that?

23 A Just the signs behind what I looked like,
24 how I came out of my room, there's constant
25 fighting, we constantly switched rooms. I had -- I

1 had a lot of traffic coming in and out of my room
2 at all times of day.

3 Q And how was Red Roof corporate supposed to
4 know that?

5 A Corporate, I don't know.

6 Q Because you understand that there were no
7 employees of Red Roof corporate at that hotel,
8 correct?

9 MR. TONGE: Objection.

10 A I'm not aware of all the employees that
11 are there on the property.

12 BY MR. ALLUSHI:

13 Q Did you ever see an employee of Red Roof
14 corporate at the hotel?

15 MR. TONGE: Objection.

16 A I wouldn't know what to look for.

17 BY MR. ALLUSHI:

18 Q Okay. Did you ever -- did anybody ever
19 come up to you and identify themselves as a Red
20 Roof corporate employee?

21 A No.

22 Q Did you ever speak to somebody that you
23 believed to be a Red Roof Inn corporate employee at
24 that time?

25 A No.

W.K., et al v. Red Roof Inns, Inc., et al

Page 317

CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

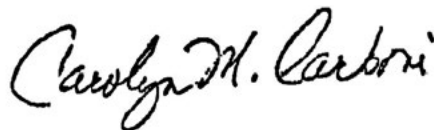
I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court.

This the 11th day of July, 2022.



CAROLYN M. CARBONI, RPR, RMR, CCR-B-878